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Attorney for Movants
AFTER MOVIE II, LLC et al.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

Originating Case: *After II Movie, LLC, et al., v. WideOpenWest Finance, LLC, et al.*, No. 1:21-cv-1901-DDD-MEH (D. Col.)

)	Case No.: 1:24-mc-73
IN RE: SUBPOENA TO INERSEX)	
HOLDINGS, LLC)	(Copyright)
)	
)	MOTION TO COMPEL
)	NONPARTY INERSEX
)	HOLDINGS, LLC TO RESPOND
)	TO SUBPOENA;
)	MEMORANDUM IN SUPPORT
)	OF MOTION; DECLARATION
)	OF COUNSEL; EXHIBITS “1”-
)	“3”; CERTIFICATE OF SERVICE
)	

**MOTION TO COMPEL NONPARTY INERSEX HOLDINGS LLC TO
RESPOND TO SUBPOENA**

AFTER MOVIE II, LLC, BADHOUSE STUDIOS, LLC, BODYGUARD PRODUCTIONS, INC., DALLAS BUYERS CLUB, LLC, HANNIBAL CLASSICS INC., I AM WRATH PRODUCTION, INC., LF2 PRODUCTIONS, INC., LHF PRODUCTIONS, INC., MILLENNIUM FUNDING, INC., MILLENNIUM IP, INC., MILLENNIUM MEDIA, INC., MON, LLC, NIKOLA PRODUCTIONS, INC., OUTPOST PRODUCTIONS, INC., PARADOX STUDIOS, LLC, RAMBO V PRODUCTIONS, INC., SCREEN MEDIA VENTURES, LLC, VENICE PI, LLC, VOLTAGE HOLDINGS, LLC, WONDER ONE, LLC, HITMAN TWO PRODUCTIONS, INC., and CINELOU FILMS, LLC (“Movants”), by and through their counsel, move this Court to grant an order: compelling nonparty INERGEX HOLDINGS, LLC (“Inergex”) to fully produce documents in response to Plaintiffs’ subpoena with 7 business days. This Motion is pursuant to Federal Rules of Civil Procedure 26(b)(1), 34(c), and 45(d)(2)(B)(i) as well as Local Rules 7.1 and 37.2 and based upon the documents filed herewith and in the underlying case.

Pursuant to LR 7.8 and 37.1, Movant’s counsel attempted to meet and confer with Inergex prior to filing this motion by sending written letter but as of the date of this motion has received no response. *See* Ex. “3”.

DATED: Kailua Kona, Hawaii, Jan. 28, 2024.

Respectfully submitted,

/s/ Kerry S. Culpepper

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